

# EXHIBIT B

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

UNITED STATES OF AMERICA, et al.,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

No. 1:23-cv-00108-LMB-JFA

**NON-PARTY CHRISTOPHER LASALA’S AFFIDAVIT IN SUPPORT OF MOTION TO  
QUASH PLAINTIFFS’ TRIAL SUBPOENA AND FOR A PROTECTIVE ORDER**

I, Christopher LaSala, swear under penalties of perjury, pursuant to Title 28 U.S.C.

§ 1746, that the following is true and correct:

1. I am not a party in the above-captioned case, and I make this Affirmation in support of a Motion to Quash Plaintiffs’ Trial Subpoena and for a Protective Order.

2. I reside in Connecticut.

3. I left my employment at Google to become a full-time professor at Columbia Business School in or around January 2022.

4. I am a full-time professor at Columbia Business School in New York, New York, where I teach graduate level courses for students seeking their Masters in Business Administration.

**PROFESSIONAL COMMITMENTS DURING THE FALL 2024 SEMESTER**

5. I teach two sections of “Product Management,” an introductory course teaching students about the product development cycle.<sup>1</sup>

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<sup>1</sup> See “Product Management,” *Columbia Business School* (last accessed Aug. 23, 2024), <https://courses.business.columbia.edu/B8636> (stating classes scheduled for Fall 2024; Tuesdays

6. I also teach “Digital Product Management Lab,” an experiential course teaching students how to use product management best practices through simulation.<sup>2</sup> This course is the “Capstone” course for students completing Columbia Business School’s Product Management pathway.<sup>3</sup>

7. The Fall 2024 semester is scheduled to begin on September 3, 2024, and approximately 160 students have enrolled in my three courses.

8. On days I am not teaching in the classroom, I spend significant time preparing course materials for the upcoming week, holding office hours with students, and providing feedback to students on their various projects.

9. My responsibilities as a Columbia faculty member extend beyond demands related to my own courses.

10. I also serve as the Elective Course Coordinator for the Product Management program, where I am responsible for coordinating several adjunct professors in delivery of the product management course.

11. Additionally, this fall, I am responsible for launching Product Executives in Residence at Columbia,<sup>4</sup> a program through which experienced product leaders will guest lecture, mentor students, and aid in curriculum development. The program is a new effort by Columbia, for

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and Thursdays); “Product Management,” *Columbia Business School* (last accessed Aug. 23, 2024), <https://courses.business.columbia.edu/B7636> (stating classes scheduled for Fall 2024; Fridays and Saturdays).

<sup>2</sup> See “Digital Product Management Lab,” *Columbia Business School* (last accessed Aug. 23, 2024), <https://courses.business.columbia.edu/B8632> (stating classes scheduled for Fall 2024; Tuesdays and Thursdays).

<sup>3</sup> “Product Management,” *Columbia Business School* (last accessed Aug 23, 2024), [Curriculum Pathways - Prod Mgmt.pdf \(columbia.edu\)](#).

<sup>4</sup> “Product Executive in Residence (pEIRs),” *Columbia Business School* (last accessed Aug. 23, 2024), [Product Executives in Residence \(pEIRs\) | Columbia Business School](#).

which there is no extant infrastructure, and will require supervision and coordination with students and the Columbia Business School administration.

12. I also serve as the faculty advisor to a student-run technology club and on the faculty advisory board for the Columbia Business School Digital Future Initiative. And as a member of the Communications Committee for Columbia Business School Marketing Division, I am responsible for informing faculty about relevant research publications. These faculty responsibilities, collectively, require additional time investment.

13. Independent of my faculty role at Columbia Business School, I advise four companies. For two of these companies, equity contracts obligate me to invest time as an advisor.

#### **INVOLVEMENT IN THE LITIGATION**

14. I previously was deposed three times, across four days, in connection with the above-captioned litigation.

15. I spent a total of approximately twenty (20) hours preparing for these depositions.

16. I was first deposed on October 20, 2020, remotely, for approximately nine hours, from around 10 a.m. to around 7 p.m. after receiving a Civil Investigative Demand.

17. I was next deposed in-person, over the course of two days, on August 16, 2023 for approximately ten hours, from around 7 a.m. to around 5 p.m., and on August 17, 2023 for approximately seven hours, from around 7 a.m. to around 2 p.m.

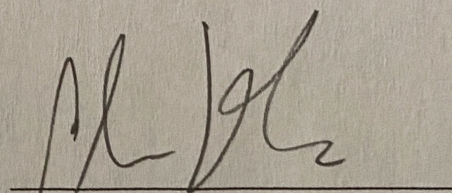
18. I was deposed a third time on November 7, 2023 for an additional approximate six-and-a-half hours, from around 9 a.m. to around 3:30 p.m.

19. The 2023 depositions were all video recorded.

20. I was not compensated for any of my time preparing for or attending these depositions.

21. My attorneys prepared this affidavit, and I reviewed it for accuracy at their request.

DATED:        Fairfield, Connecticut  
                 August 22, 2022

  
CHRISTOPHER LASALA